

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSALIE ROMANO; PATRICIA GLUECKERT,)
individually and on behalf of the Estate of WILLIAM G.)
GLUECKERT; WILLIAM P. GLUECKERT; JAYNE)
MANN; ROSS MEADOW and ARLENE MEADOW;)
JACOB KHOLODNY and BELLA KHOLODNY; FLO)
RAUCCI, individually and on behalf of the Estate of)
SALVATORE RAUCCI; DANIEL GALLANTE and)
JENNIFER GALLANTE; TERESA MEADE, DONALD)
LAGOMARSINO, SCOTT RUST, LAURIE FRANKS,)
THOMAS NUCCI, CHRISTOPHER BLADES, DAWN)
CIRINO-SAMBADE, MARY ELLEN GINTY, JOHN)
SCHLOSSER, individually and on behalf of all others)
similarly situated; and DENISE FLORIO; MARYANN)
HERBERT; CHRISTINA ANDREWS-SALES;)
CHRISTOPHER CAGNA; JACKIE LIEBERMAN;)
CATHERINE LEWONKA; EUGENE CONNOLLY;)
VIVIANE BLICKENS DERFER; DANA)
BLICKENS DERFER; GLENN FALINO and MARCIA)
FALINO; individually,)

Plaintiffs,)

vs.)

NORTHROP GRUMMAN CORPORATION;)
NORTHROP GRUMMAN SYSTEMS CORPORATION)

Defendants.)
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Case No: 16-cv-5760
GRB-ST

DECLARATION OF ROBERT GITELMAN IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO THE MOTION TO EXCLUDE THE OPINIONS OF W.
RICHARD LATON

I, Robert Gitelman, submit this declaration, pursuant to the Court Order dated
December 2, 2023, along with the exhibit annexed hereto, in further support of Plaintiff’s
Opposition to Motion to Exclude the Opinions of W. Richard Laton.

1) Attached hereto as Plaintiffs' Supplemental Exhibit are true and correct copies of the excerpts from Defendant's expert Dr. Nathan Epler August 2, 2022 Deposition Testimony cited to in Plaintiffs Opposition to Motion to Exclude.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Melville, New York
December 4, 2023

Respectfully submitted,

*Counsel for Plaintiffs and
the Proposed Classes*

NAPOLI SHKOLNIK

By: /s/ Robert Gitelman

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